

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ROWENA WAGNER,

Plaintiff

v.

CRAWFORD CENTRAL SCHOOL  
DISTRICT, et al.

Defendants

)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)

Civil Action No. 04-264 ERIE

JUDGE SEAN J. McLAUGHLIN

**JOINT MOTION TO ENLARGE DISCOVERY PERIOD  
AND AMEND CASE MANAGEMENT ORDER**

AND NOW, this 14th day of August, 2005, come Plaintiff, Rowena Wagner, and Defendants, Crawford Central School District, the Board of Education of the Crawford Central School District, Michael E. Dolecki and Charles E. Heller, III, and Defendant Crawford Central Education Association, by and through their attorneys, the undersigned, motioning the Court to enlarge the discovery period and amend the Case Management Order, stating in support thereof the following:

1. Pursuant to the Court's initial Case Management Order dated May 10, 2005, the discovery period is scheduled to end on September 7, 2005.
2. The Court's Order also provided filing deadlines for dispositive motions, pretrial narratives and other matters.
3. The parties have concluded the exchange of voluminous written discovery and anticipate the scheduling and conducting of a significant number of depositions which will take several months to complete.

4. Plaintiff's counsel has advised Defendants that Plaintiff gave birth to a baby recently, which involved some degree of surgery. Plaintiff's physician, Dr. Denise Johnson of Meadville Medical Center, does not approve of Plaintiff being deposed until sometime during September 2005 (date to be determined).

5. Therefore, the parties request a 99-day enlargement of the discovery period and a similar amendment to the remainder of the schedule in the Court's initial Case Management Order.

6. No prejudice would result if the Court were to grant this motion.

7. This is the parties' first request to enlarge the discovery period.

WHEREFORE, Plaintiff, Rowena Wagner, and Defendants, Crawford Central School District, the Board of Education of the Crawford Central School District, Michael E. Dolecki and Charles E. Heller, III, and Defendant Crawford Central Education Association respectfully request the Court to order that the discovery period be enlarged until December 15, 2005, that dispositive motions be filed on or before January 4, 2005, that Plaintiff's pretrial narrative statement be filed on or before January 4, 2005 and that Defendant's pretrial narrative statement be filed on or before January 24, 2005.

Respectfully submitted,

By Caleb L. Nichols  
Caleb L. Nichols, Esq.  
P.O. Box 1585  
Erie, PA 16507  
(814) 838-1877

Attorney for Plaintiff  
Rowena Wagner

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &  
SENNETT, P.C.

By Mark J. Kumar  
Mark J. Kumar, Esq.  
120 West Tenth Street  
Erie, Pennsylvania 16501-1461  
(814) 459-2800

Attorneys for Defendants,  
Crawford Central School District, The  
Board of Education of Crawford Central  
School District, Michael E. Dolecki and  
Charles E. Heller, III

By Richard S. McEwen  
Richard S. McEwen, Esq.  
Crawford Central Education Association  
4250 Route 6N  
Edinboro, PA 16412-1735

Attorneys for Defendant,  
Crawford Central Education Association

# 626929

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ROWENA WAGNER,

Plaintiff

**V.**

CRAWFORD CENTRAL SCHOOL  
DISTRICT, et al.

## Defendants

Civil Action No. 04-264 ERIE

JUDGE SEAN J. McLAUGHLIN

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the preceding *Joint Motion to Enlarge Discovery Period and Amend Case Management Order* has been served by first class, United States mail, postage pre-paid on the 14th day of August, 2005 as follows:

**Mark J. Kuhar, Esq.**  
**Knox McLaughlin Gornall & Sennett, P.C.**  
**120 West Tenth Street**  
**Erie, PA 16501**

**Richard S. McEwen, Esq.**  
**Crawford Central Education Association**  
**4250 Route 6N**  
**Edinboro, PA 16412**

Respectfully submitted,

By Caleb L. Nichols  
Caleb L. Nichols, Esq.  
P.O. Box 1585  
Erie, PA 16507

Attorney for Plaintiff,  
Rowena Wagner